

### REMARKS

Claims 1-2 are pending in the application. Claim 2 has been amended and claim 3 has been added, leaving claims 1-3 for consideration upon entry of the present Amendment. Applicants respectfully request reconsideration in view of the Amendment and Remarks set forth below.

Applicants' Attorney would like to thank the Examiner for discussing this application. Applicants' Attorney agrees with the substance of the Interview as described in the Interview Summary.

Claims 1 and 2 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Prior Art figure 3. For an obviousness rejection to be proper, the Examiner must meet the burden of establishing that all elements of the invention are disclosed in the prior art; that the prior art relied upon, coupled with knowledge generally available in the art at the time of the invention, must contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or combined references; and that the proposed modification of the prior art must have had a reasonable expectation of success, determined from the vantage point of the skilled artisan at the time the invention was made. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988); *In Re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970); *Amgen v. Chugai Pharmaceuticals Co.*, 927 U.S.P.Q.2d, 1016, 1023 (Fed. Cir. 1996).

Claim 1 includes the following limitations: "a plurality of capacitance lines extending in each row and connected to and shared by the other end of said capacitance of said display pixels; wherein a constant voltage is supplied from **both ends** of said capacitance lines." (Emphasis supplied). The Examiner acknowledges that Figure 3 does not disclose a plurality of capacitance lines extending in each row. The Examiner states that it would have been obvious to one of ordinary skill in the art at the time the invention was made to install a plurality of capacitance lines extending in each row in the Prior Art because Prior Art only shows one pixel.

However, Applicants are claiming not only a plurality of capacitance lines, but also that a constant voltage is supplied from both ends of the capacitance lines. In Figure 3, the voltage source,  $V_{SC}$ , is supplied from only one end of the capacitance line. Moreover, the

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location of the voltage source does not allow for a constant voltage to be supplied from the both ends of the capacitance lines. Accordingly, claim 1 is patentable over Figure 3 and Applicants respectfully request that the rejection be withdrawn.

Claim 2 includes the following limitation: "a second capacitance line connected to first ends of said plurality of first capacitance lines; a third capacitance line connected to second ends of said plurality of first capacitance lines; wherein said second and third capacitance lines are connected to a common constant voltage source, and said constant voltage is supplied to said first ends and said second ends of said plurality of first capacitance lines through said second and third capacitance lines." Figure 3 does not teach or suggest that a second capacitance and a third capacitance line are connected to a common constant voltage source or that the constant voltage is supplied to the first end and the second end of the first capacitance lines through the second and third capacitance lines. Figure 3 teaches that the voltage source,  $V_{sc}$ , is supplied from only one end of the capacitance line. Accordingly, claim 2 is patentable over Figure 3 and Applicants respectfully request that the rejection be withdrawn.

Moreover, an Examiner cannot establish obviousness without also providing evidence of the motivating force that would have impelled one skilled in the art to do what the patent applicant has done. *Ex parte Levengood*, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. Int. 1993). Thus, Figure 3 must suggest the invention. In this case, there is no teaching or suggestion in Figure 3 of having a voltage supplied from both ends of the capacitance lines. In fact, Figure 3 teaches away from having a voltage supplied from both ends of the capacitance lines because Figure 3 teaches that the voltage source is connected only to one end of one capacitance line.

In view of the foregoing, it is respectfully submitted that the instant application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone conference with Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is cordially requested to telephone the undersigned.

In the event the Commissioner of Patents and Trademarks deems additional fees to be due in connection with this application, Applicants' attorney hereby authorizes that such fee be charged to Deposit Account No. 06-1130.

Respectfully submitted,

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